

incumbent LEC provides to a requesting telecommunications carrier is at least "equal-in-quality," or at parity, with what the incumbent LEC provides to itself. 47 C.F.R. § 51.311. Ameritech's interconnection agreements require such technical parity regarding network elements provided to all requesting carriers. See AT&T § 9.4.

50. When Ameritech uses a facility, functionality, feature or information in the provision of a bundled service that is comparable to a network element, Ameritech provides it at parity. Parity is generally achieved by using comparable facilities, parameters, practices, procedures and systems to provision, provide and maintain network elements and that are comparable to facilities used to provide retail services for Ameritech retail customers. Mr. Mickens discusses how Ameritech ensures parity in his affidavit.

**3. Combination or Rebundling of Network Elements**

51. Ameritech's agreements meet each of the FCC's requirements regarding combination or rebundling at network elements. See 47 C.F.R. § 51.315. Unless otherwise requested, network elements are provided by Ameritech unbundled from other elements and facilities. Ameritech provides unbundled network elements in a way that enables requesting telecommunications carriers to combine them to provide a telecommunication service to their customers. Brooks Fiber § 9.5.2; MFS § 9.5.2; TCG § 9.5.2; AT&T § 9.3.1. This is accomplished through the use of standard interfaces, specifications, facilities, procedures and practices that facilitate a requesting telecommunications

carrier's ability to combine network elements provided by Ameritech with other network elements or with the requesting telecommunications carrier's own facilities. AT&T § 9.3. Ameritech also provides unbundled access to OSS functions necessary for requesting telecommunications carriers to purchase and combine network elements. AT&T § 9.4.3.

52. In addition, upon request, Ameritech provides, as a single, combined network element, facilities that comprise more than one network element. Ameritech performs the functions necessary to combine elements that are ordinarily combined within its network in the same manner in which they are typically combined by it. AT&T § 9.3.3. Ameritech also performs functions necessary to combine elements, if they are not ordinarily combined in the requested manner -- or at all -- in its network, where it is technically feasible to make such combination function as a single combined element and doing so would not undermine the ability of other carriers to access unbundled elements or interconnect with Ameritech. AT&T § 9.3.3. Upon request, Ameritech combines its network elements with facilities and equipment of the requesting telecommunications carrier where it is technically feasible to make such combination function as a single combined element.
53. Network elements are not combined where the combination will impair network reliability or security or undermine the ability of other carriers to access unbundled

elements or to interconnect with Ameritech's network. 47 C.F.R. § 51.315(c). AT&T § 9.3.3. If Ameritech finds that a requested combination is not technically feasible, including because it cannot be made to function as a single element, will impair network reliability or security, or will undermine the ability of other carriers to access unbundled elements or to interconnect with Ameritech's network, Ameritech will explain why to the requesting telecommunications carrier and be prepared to explain its conclusion to the MPSC.

54. Requesting telecommunications carriers order combinations of elements by specifying the network elements or facilities they seek to have combined. Requests for combinations that are not already being provided by Ameritech are addressed through the BFR Process. AT&T § 9.6.
55. Ameritech currently provides three standard network element combinations: Unbundled Element Platform with Operator Services and Directory Assistance, Loop Combination and Switching Combination No. 1. The details of these combinations are set forth in Schedule 9.3.4 of the AT&T Agreement. Examples of other combinations that might be requested through the BFR process are listed in the AT&T Agreement, Schedule 9.3.5.

## **B. Core Unbundled Network Elements**

56. As required by the Act and Rules, Ameritech provides nondiscriminatory access to the following core unbundled network elements:

- Local Loop Transmission
- Network Interface Device
- Local and Tandem Switching
- Interoffice Facilities
- Signaling Links and Call-Related Databases
- Operations Support Systems Functions
- Operator Services and Directory Assistance

AT&T § 9.2, Schs. 9.2.1-9.2.7. These are the core network elements required under the Checklist and the FCC's Rules. See 47 U.S.C. § 271(c)(2)(B)(ii), (iv-vii), (x); 47 C.F.R. § 51.319. Some of these elements are required by the Checklist and therefore are discussed in separate sections. Other core elements, however, were not specified in the Checklist but rather have been required to be unbundled by the FCC. These elements, discussed in this section, are NIDs and access to OSS functions. The FCC also requires that operator call completion and directory assistance elements be unbundled. Ameritech's unbundling of these elements is discussed below under Checklist item (vii). Ameritech does not believe that operator services and directory assistance are properly treated as unbundled "elements"; however, that issue will now be decided by the courts, and for the time being, these services may be lumped in with the core unbundled network elements.

**1. Network Interface Device**

57. The FCC's Rules (47 C.F.R. § 51.319(b)) require that Ameritech allow requesting carriers, and other carriers that provide their own local loops, to access end user customer inside wire through a connection between their own adjoining NID and Ameritech's NID. Ameritech will enable requesting telecommunications carriers to do so upon request. AT&T Sch. 9.2.2. The requesting telecommunications carrier establishes the connection through an adjacent NID device it provides. AT&T Schs. 9.2.2, 9.5(3.1). Due to the variety of NIDs currently in place in Ameritech's network, Ameritech uses several methods for providing requesting telecommunications carriers with access to the customer's inside wire, all of which meet the requirements of the FCC's Rules. AT&T Sch. 9.5(3.2). Accordingly, Ameritech's unbundled NID element satisfies the Act, Rules, and Checklist.
58. Ameritech is currently furnishing NIDs to Brooks Fiber and MFS as part of their purchase of unbundled loops.

## **2. Access to Operations Support Systems Functions**

59. Section 51.319(f) of the FCC's Rules requires incumbent LECs to provide unbundled, nondiscriminatory access to their OSS functions equivalent to the access enjoyed by Ameritech or its affiliates. These are functions supported by Ameritech's databases and information that support pre-ordering, ordering, provisioning, maintenance and repair, and billing of unbundled elements and resold services. As required by the FCC, Ameritech provides access to these functions via electronic interfaces where Ameritech customer contact personnel use electronic interfaces and via manual interfaces where they do not. In each case, such access is at least equal in quality to that Ameritech provides to itself, its affiliates or other carriers, which should enable competing carriers to perform these functions in substantially the same time and manner as Ameritech. 47 C.F.R § 51.319(f)(2). AT&T §§ 9.2.6, 9.5.2. These interfaces are available consistent with the requirements of the FCC's Rules as clarified in the Second Reconsideration Order. Specifically, Ameritech provides sufficient information regarding the interfaces and standards used to provide access to its OSS functions to enable requesting carriers to develop and maintain their own systems and procedures to make effective use of those interfaces. Ameritech also provides requesting telecommunications carriers with access to the functionality of any internal gateway systems it uses in accessing OSS functions for its own customers. Order, ¶ 523. AT&T § 9.5, Sch. 9.5(7.2). Ameritech's unbundling of access to each of the required OSS functions is described below.

60. Ameritech is currently furnishing Brooks Fiber, MFS and TCG with access to Ameritech's OSS functions.
61. **Pre-Ordering, Ordering and Provisioning.** Ameritech provides unbundled nondiscriminatory and equal-in-quality access to the electronic interfaces used for the transfer and receipt of data necessary to perform pre-ordering, ordering and provisioning functions. These interfaces are consistent with applicable industry standards, as described in § 10.13.2(a) and Schedule 9.2.6 of the AT&T Agreement.
62. The pre-ordering and ordering OSS functions provided through these interfaces include:
- Access to Telephone Number Selection. This function gives a requesting telecommunications carrier's service representatives the same ability as Ameritech service representatives to select and reserve telephone numbers from the Ameritech-maintained pool of available telephone numbers.
  - Access to Feature Availability. This function gives Ameritech's and the requesting carrier's service representatives the same ability to determine Feature Availability; that is, what features/services currently may be provided to an end user served by a given central office or telephone number prefix.
  - Access to the Due Date Selection capability. This function gives a competing carrier's service representative the same ability as an Ameritech service representative to select an order due date and appointment based on work force availability and whether outside work is required.
  - Access to Address Validation capability. This function gives requesting carriers' service representatives the same ability as Ameritech's service representatives to determine whether a given address is valid; that is, properly expressed, existing and within the Ameritech service territory.

- Access to Order Entry. This function creates the ability to transmit to Ameritech an order for initial service, subsequent change activity, account disconnection or a change of local service provider on the same basis as Ameritech's service representatives.

63. Ameritech also provides requesting telecommunications carriers with a Customer Service Record ("CSR") for a customer. In order to protect the privacy of customer proprietary information at the pre-ordering stage, the requesting telecommunications carrier need only provide Ameritech with a Letter of Authorization ("LOA") from a customer prior to receiving a CSR from Ameritech. See AT&T § 10.11.1. Ameritech reserves the right to perform random audits of a requesting telecommunications carrier's LOAs to ensure accuracy.
64. As for OSS provisioning functions, Ameritech enables requesting telecommunications carriers to verify the status of orders by providing them with an electronic initial order confirmation, order completion information and any status changes recorded as part of Ameritech's order management that indicate when an order is in jeopardy of not being completed on time. All of these capabilities are made available to requesting carriers on the same basis as they are made available to Ameritech's own service representatives.
65. **Maintenance and Repair.** Ameritech provides requesting carriers with an electronic interface for transferring and receiving data necessary to perform maintenance and repair functions. AT&T § 10.13.3(a). This interface is consistent with applicable existing

industry standards and is administered through a gateway serving as a single point of contact for the transmission of data. Id., Sch. 9.2.6(2.0). Through this interface, Ameritech enables requesting telecommunications carriers to electronically transmit to Ameritech a trouble report, and receive an initial status (based on preliminary testing by Ameritech) and an appointment commitment, on the same basis as Ameritech's own service representatives. Ameritech also provides requesting telecommunications carriers with an update to the trouble report status each time that status is updated by Ameritech personnel.

66. **Billing.** Ameritech electronically provides requesting carriers with a daily usage feed and a monthly billing report to enable requesting telecommunications carriers to bill their end users. AT&T § 10.16.1, Sch. 9.2.6(3.0). Ameritech provides billing data for resale services through the Ameritech Electronic Billing System ("AEBS"), a system developed by Ameritech to bill for local and resold service. Ameritech uses this system for resale billing, because such billing is essentially the same as the retail billing for which AEBS was designed. Also, AEBS is currently being used by resellers of Ameritech service. Ameritech provides billing data for unbundled network elements in the Carrier Access Billing System ("CABS") for non-switching elements and the AEBS format for switching elements.

67. In all cases, Ameritech provides requesting carriers with access to OSS functions used for pre-ordering, ordering, provisioning, maintenance and repair, and billing processes on the same basis that it provides such access to itself and its affiliates. Where Ameritech's customer contact employees use a manual process to input data or obtain data from a particular system, a comparable manual interface for access is provided to requesting telecommunications carriers. Where Ameritech's customer contact employees use electronic interfaces to access OSS functions, equivalent interfaces are provided to requesting carriers where technically feasible. In addition, the quality of access adheres to existing national protocols and standards wherever such protocols and standards exist. See AT&T §§ 10.13.2(a), 10.13.3(a), 10.16. OSS features are discussed in detail by Mr. Rogers and Mr. Mickens in their affidavits.

### **III. CHECKLIST ITEM (iii): ACCESS TO RIGHTS-OF-WAY**

68. Section 271(c)(2)(B)(iii) requires Ameritech to provide "[n]ondiscriminatory access to [its] poles, ducts, conduits, and rights-of-way . . . at just and reasonable rates in accordance with the requirements of Section 224." Ameritech makes its poles, ducts, conduits and rights-of-way ("Structure") available for the placement of requesting telecommunications carriers' wires, cables and related facilities to the extent it may lawfully do so. See Brooks Fiber § 15.0; MFS § 15.0; TCG § 16.0; AT&T Art. XVI. Ameritech's contracts satisfy Sections 271 and 224 by not favoring Ameritech or its subsidiaries or affiliates over requesting telecommunications carriers or any other third

party. See AT&T § 16.1. The specifics of Ameritech's contracts in this area are discussed by Mr. Mayer.

69. Ameritech is currently furnishing Brooks Fiber and MCI Metro with access to Ameritech's poles, ducts, conduits and rights-of-way. At present, requests for approximately 20,000 feet of conduit and innerduct have been completed by Ameritech and accepted by customers. Ameritech also is currently furnishing access to 140 poles.

#### **IV. CHECKLIST ITEM (iv): LOCAL LOOP TRANSMISSION**

70. Ameritech provides "local loop transmission from the central office to the customer's premises, unbundled from local switching or other services," as required by the Act, § 271(c)(2)(b)(iv). An unbundled loop is a transmission path between a distribution frame, or its equivalent, in an Ameritech central office and the network interface device at the customer premises. See AT&T Sch. 9.2.1. This definition complies with the definition in the Rules. 47 C.F.R. § 51.319(a).
71. Ameritech makes available to requesting telecommunications carriers the full range of standard unbundled loops, including 2-wire and 4-wire loops supporting analog, ISDN, ADSL, HDSL and 1.544 Mbps digital (DS1) transmission. Order, ¶ 380. Brooks Fiber § 9.1; MFS § 9.1; AT&T Sch. 9.2.1. Ameritech provides access to its unbundled loops at each of Ameritech's wire centers via collocation and a cross-connect and will consider

requests for access at other points through the BFR Process. AT&T Sch. 9.5(2.1). Ameritech also provides unbundled access to loops served by Integrated Digital Loop Carrier ("IDLC") or Remote Switching deployed as a loop concentrator through the BFR process. AT&T Sch. 9.5(2.1.2).

72. Ameritech satisfies the FCC's Rules by providing unbundled access to all basic loop types. The Rules do not require any further unbundling of local loop transmission (except for NIDs, as discussed above). However, Ameritech will consider specific requests for unbundling of other loop types and subloop elements through the BFR Process.

73. Ameritech is currently furnishing unbundled local loop transmission to both Brooks Fiber and MFS under their Agreements. At this time, Brooks Fiber has leased approximately \_\_\_\_ loops from Ameritech, and MFS has leased approximately \_\_\_\_ loops in Michigan. As of December 1996, a total of over 16,000 unbundled loops had been leased from Ameritech in Michigan and 27,000 in Ameritech's five-state region.

#### **V. CHECKLIST ITEM (v): LOCAL TRANSPORT**

74. Checklist Item (v) requires BOCs to unbundle local transport facilities, also called interoffice transmission facilities, that are dedicated to a particular customer or carrier or shared by more than one customer or carrier. 47 U.S.C. § 271(c)(2)(B)(v); 47

C.F.R. § 51.319(d). These are facilities that provide telecommunications between wire centers or switches owned by incumbent LECs or requesting telecommunications carriers.

47 C.F.R. § 51.319(d)(1). Ameritech provides access to both types of interoffice facilities through its interconnection agreements on the trunk side of the switch and unbundled from switching or other elements. 47 U.S.C. § 271(c)(2)(B)(v). AT&T Sch. 9.2.4.

75. Specifically, Ameritech provides access to unbundled dedicated interoffice transport and entrance facilities and shared transport facilities as described in Schedule 9.2.4 of the AT&T Agreement. While dedicated transport involves a circuit dedicated to a certain requesting carrier, shared transport is an arrangement where two or more requesting carriers share the features, functions and capabilities of a transmission facility, along with the cost. AT&T Sch. 9.2.4. The actual price paid by each carrier sharing the facility depends on the number of carriers sharing the facility and the respective billing percentage assigned to each carrier. Ameritech considers requests to provide unbundled access to other interoffice transmission facilities through the BFR process. AT&T Sch. 9.2.4(4.10).

76. Ameritech's unbundled local transport fully complies with the Act and Rules by allowing access to both dedicated and shared transport, including all technically feasible transmission facilities, features, functions and capabilities that a requesting carrier could

use to provide a telecommunications service. 47 C.F.R. § 51.319(d)(2)(ii). AT&T Sch. 9.5(5.2). Requesting telecommunications carriers are permitted, to the extent technically feasible, to connect unbundled interoffice transmission facilities to any equipment they designate, including their own collocated equipment. 47 C.F.R. § 51.319(d)(2)(iii). AT&T Sch. 9.5(5.3). As part of this element, Ameritech also provides requesting carriers with access to digital cross-connect systems in the same manner that Ameritech provides that functionality to IXC's. 47 C.F.R. § 51.319(d)(2)(iv). AT&T Sch. 9.5(5.4).

77. Ameritech provides requesting carriers, including Brooks Fiber, MFS and TCG, with transport under tariff.

**VI. CHECKLIST ITEM (vi): LOCAL AND TANDEM SWITCHING**

78. The Checklist (§ 271(c)(2)(B)(vi)) and the FCC's Rules (47 C.F.R. § 51.319(c)) require BOCs to unbundle local switching from transport, local loop transmission or other services. The Rules also require unbundling of local and tandem switching capabilities, including trunk-connect facilities; the basic switching function of connecting trunks to trunks; and the functions centralized in tandem switches (as opposed to end office switches). 47 C.F.R. § 51.319(c)(2). Ameritech's interconnection agreements satisfy these requirements.

79. **Local Switching.** As required by the Checklist and § 51.319(c)(1)(i) and (ii) of the FCC's Rules, Ameritech is providing requesting telecommunications carriers access to Ameritech's unbundled local switching through line-side and trunk-side ports, including all features, functions and capabilities available in the switch for the port type requested, on a line-by-line basis. AT&T Sch. 9.2.3(1.0). Other technically feasible switching features, functions and capabilities, and custom and special routing, are available through the BFR Process. Id., Sch. 9.5(4.1.4).
80. As § 271(C)(2)(B)(iv) requires, Ameritech provides local switching unbundled from transport, local loop transmission and other elements. The requesting telecommunications carrier separately subscribes to or provides sufficient local loops, transport and other elements or facilities to handle traffic to and from the unbundled line-side and trunk-side ports to which it subscribes. The requesting carrier also receives electronic access to activate or deactivate features, functions and capabilities of the switch as a single element on a per-line basis.
81. Access to unbundled local switching is provided through line-side ports, which include, but are not limited to, a connection between an MDF or DSX or transport provided by the requesting carrier and a switch line card provided by Ameritech. Standard line-side port types available to a requesting telecommunications carrier include:
- Basic Port
  - Ground Start Port

- COPTS-Coin Port
- ISDN Direct Port
- Centrex Attendant Port
- Centrex EKL Port
- Centrex ISDN Direct Port

82. Access to unbundled local switching is also provided through standard DS-1 trunk-side ports, which include the trunk termination at a trunk-side frame and a switch trunk card.

Available trunk-side ports include:

- Direct Inward Dialing ("DID") Trunk Port
- ISDN Prime Trunk Port
- Digital Trunking Port
- ULS Trunk Port

83. Calls to another trunk-side port through unbundled local switching are transmitted to that port, if requested, to the fullest extent of the switch's technical capabilities, based upon the requesting telecommunications carrier's agreement to pay the applicable recurring and nonrecurring costs of developing, providing and maintaining the function. On an optional basis, requesting telecommunications carriers can request additional or different port types through the BFR Process.

84. The unbundled local switching network element includes the standard switching functions of connecting lines to lines, lines to trunks, trunks to lines and trunks to trunks. 47 C.F.R. §51.319(c)(1)(i)(C)(1). AT&T Sch. 9.2.3(1.0). As required, the unbundled switching network element provides, on a standard basis, electronic access to all features,

functions and capabilities of the switch available to Ameritech's customers from that switch for the type of port connection involved (AT&T Sch. 9.5(1.2)), including:

- dial tone
- a telephone number
- one White Pages directory listing
- standard line class code local routing and signaling
- access to 911
- access to Ameritech's operator services
- access to Ameritech's directory assistance

85. A requesting telecommunications carrier purchasing unbundled local switching also obtains access to switching capabilities and features of the switch in a single element on a per-line basis, including the ability to deploy vertical individual features via an electronic ordering interface. Unbundled local switching includes, on a standard basis, access to all vertical features, functions and capabilities of the switch available to the port type involved that Ameritech provides to its end user customers, such as custom calling, CLASS and Centrex features to the port type involved. 47 C.F.R. § 51.319(c)(1)(i)(C)(2). AT&T Sch. 9.5(4.1.3-4.1.6). For example, some of the features that may be activated with basic and ground start line-side ports include, as applicable and where available:

- Call Waiting
- Call Forwarding — Variable
- Three-Way Calling
- Automatic Callback
- Repeat Dialing
- Call Screening
- Caller I.D.
- Busy Line Transfer
- Busy Line Transfer/With Custom Control Option

- Alternate Answering
- Alternate Answering/Customer Control Option
- Message Waiting Tone
- Easy Call
- Special Delivery Feature
- Multi Ring Service
- Remote Call Forwarding
- Direct Connect

86. Upon request, Ameritech provides unbundled local switching using any technically feasible custom and special routing by class-of-call (e.g., local, toll, operator services, directory assistance, 911, etc.), including switching custom-routed calls by call type to trunks designated by the requesting carrier. AT&T Sch. 9.5(4.1.5, 4.1.7). I will discuss special and custom routing by class of call later in conjunction with branding of operator services and directory assistance.

87. **Tandem Switching.** As with local switching, Ameritech provides access to tandem switching unbundled from loops, transport and other elements. Unbundled tandem switching provides requesting telecommunications carriers with access to all available basic tandem switching functions. AT&T Sch. 9.2.3(2.4). Basic capabilities that are centralized in the tandem switch and that Ameritech makes available to its end user customers, include, but are not limited to:

- Routing of calls from an inbound trunk to an outbound trunk based on destination digits
- Routing of Equal Access or Operator Service calls from an inbound trunk to an outbound trunk based on the CIC (Carrier Identification Code) forwarded by the inbound trunk

88. Ameritech's unbundled tandem switching meets all requirements of the FCC's Rules. See 47 C.F.R. § 51.319(c)(2). Unbundled tandem switching provides trunk-connect facilities, including, but not limited to, the connection between trunk termination at a cross-connect panel and a switch trunk card. AT&T Sch. 9.2.3(2.1). The tandem switching network element also performs all tandem basic switching functions of connecting trunks to trunks, including trunks of the requesting carrier. Unbundled tandem switching further provides access to any functions that are centralized in the tandem switches, including call recording, the routing of calls to operator services and signaling conversion features. AT&T Sch. 9.2.3(2.4). Ameritech also connects a requesting carrier's tandem switching ports with those of other telecommunications carriers, interexchange carriers, Ameritech and an incumbent LEC upon request. AT&T Sch. 9.2.3(2.1).
89. Based on their planned network architecture and market entry strategy, many telecommunications carriers have not specifically requested any type of unbundled local switching element from Ameritech. This may be the result of the ready availability of switching equipment or of a "mix and match" entry strategy by new entrants to begin competing by combining unbundled network elements with their own switching equipment. In addition, new entrants may prefer to provide their own switching as a means of avoiding access charges by providing exchange access service to itself. See 47

C.F.R. § 51.309(b). The various entry strategies of new entrants are discussed in the affidavit of Doctors Harris and Teece.

**VII. CHECKLIST ITEM (vii): 911/E911, DIRECTORY ASSISTANCE AND  
OPERATOR CALL COMPLETION**

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**A. 911/E911**

90. Checklist Item (vii) requires that Ameritech provide "[n]ondiscriminatory access to ... 911 and E911 Services." 47 U.S.C. § 271(c)(2)(B)(vii)(I). Ameritech meets this requirement.
91. Ameritech provides customers of competitive local exchange carriers with access to the type of 911 service selected by the municipality in which they reside in a manner identical to the 911 service supplied to Ameritech's own customers. AT&T § 3.11. Compliance is measurable and readily verifiable by competing carriers pursuant to a well-defined operational plan. Ameritech has already demonstrated compliance with this requirement by furnishing access to 911 and E911 to several competitive carriers, including Brooks Fiber, MFS, MCI Metro, TCG and WinStar Wireless.
92. Ameritech's E911 network forwards the end user caller's telephone number or central office identification code to the appropriate primary Public Safety Answering Point ("PSAP") or designated alternative locations on 911 calls. With E911, the end user's

telephone number is displayed at the PSAP and also used to retrieve the corresponding end user name and address for display at the 911 call-taker's position at the PSAP.

93. Under the E911 arrangement, Ameritech provides requesting telecommunications carriers access to its 911 services. Ameritech provides trunking from the requesting telecommunications carrier's collocation point to the E911 control office (Selective Router). Ameritech will also assist a requesting telecommunications carrier in designing and sizing its interconnection to Ameritech's control office.
94. Ameritech's 911 and E911 services are defined in the Brooks Fiber Agreement (§ 18.0), the MFS Agreement (§ 18.0) and the AT&T Agreement (§ 3.11, Sch. 3.11). As of December 31, 1996, there were twenty-three 911 trunks in service in Michigan from the switches of four CLECs. Ameritech provides these trunks to, among others, Brooks Fiber, MFS, TCG and MCI Metro.

**B. Directory Assistance and Operator Call Completion**

95. Ameritech provides nondiscriminatory access to operator call completion services and directory assistance services ("OS/DA") in several different ways, as required by the Checklist, the FCC's Order and Second Report and Order, and the Rules. In addition, Ameritech provides OS and DA as unbundled network elements pursuant to 47 C.F.R. § 51.319(g).

96. The specific Operator Services provided by Ameritech to requesting carriers include:

- (1) Manual Call Assistance, meaning manual call processing with operator involvement for calling card calls, collect calls, third number billed calls, and operator assistance (e.g., call completion and emergency calls);
- (2) Operator Transfer Service (dialing 0 and requesting connection to an interexchange carrier);
- (3) Busy Line Verification ("BLV") and Interrupt ("BLVI") services (at the user's request, the operator verifying that line is busy or to interrupt a connection that is in progress);
- (4) Automated Call Assistance; that is, mechanized call processing for automated calling card services and automated alternate billing services;
- (5) Line Information Data ("LIDB") Validation, which allows mechanized queries to the LIDB for call validation of alternately billed calls;
- (4) Database Access, which, upon request and where technically feasible, provides electronic access to Ameritech's OS databases to enable a requesting carrier to provide its own OS; and
- (5) Optional Features, such as certain types of branding, upon request and as technically feasible.

AT&T Sch. 9.2.7.

97. Directory Assistance provided by Ameritech to requesting carriers includes:

- (1) Directory Assistance, which allows a requesting carrier's end users to dial digits designated by the telecommunication carrier to obtain listed telephone numbers of and information regarding other subscribers;
- (2) Branding, which is the ability to put messages on the front end of a DA call that is directly trunked to Ameritech's Operator Services Platform; and
- (3) Information Call Completion, which, where facilities permit, will give end users who have received a number from an Audio Response Unit the

option of completing the call by pressing a specific digit on a touch tone telephone where the requesting telecommunications carrier direct-trunks its DA calls to Ameritech.

AT&T Sch. 9.2.7.

98. **Standard OS/DA.** Ameritech provides access to its standard OS and DA in conjunction with telephone exchange service it provides to resellers and to requesting telecommunications carriers receiving unbundled local switching. AT&T Sch. 9.5(8.0). The OS and DA functions provided in each case are identical to what Ameritech provides to its end user customers. 47 C.F.R. § 51.217(a)(2). AT&T Sch. 9.5(8.12). The access arrangements to OS and DA enable requesting telecommunications carriers and resellers to offer their subscribers the ability to gain access to Ameritech's OS or DA through the prevailing dialing arrangements for local directory assistance (e.g., 411, 0, (NPA), and 555-XXXX) with no unreasonable dialing delay. 47 C.F.R. § 51.217(c)(2). AT&T Art. XIV.

99. **Unbundled OS or DA.** Requesting telecommunications carriers can request that Ameritech provide OS or DA unbundled from Ameritech's telephone exchange and unbundled local switching services or from any other service or facility of Ameritech. Such unbundled OS or DA can be used by the requesting carrier to provide OS or DA to its local exchange customers. Requesting carriers ordering unbundled OS/DA deliver their traffic to Ameritech's OS or DA facilities on separate trunks that the requesting

carrier either provides itself or obtains from Ameritech or another source. AT&T Sch. 9.5(8.9).

100. **Unbundled Access to OS or DA Databases.** Upon request and as technically feasible, Ameritech provides unbundled access to the databases its uses to provide OS or DA for purposes of enabling a requesting telecommunications carrier to provide its own OS and/or DA. AT&T Sch. 9.5(8.10). As required by 47 C.F.R. § 51.217(c)(3)(ii), unbundled access to Ameritech's OS or DA databases is provided, as is technically feasible, on an equal-in-quality basis based upon the facilities, equipment and software involved. Id. Unbundled access to Ameritech's databases is requested through the BFR Process. Id.
101. Ameritech also provides access to adjunct OS or DA features (e.g., rating tables or customer information databases) necessary to allow competing providers full use of OS/DA services. 47 C.F.R. § 51.217(d). AT&T Sch. 9.2.7.(2.4).
102. **Optional Rebranding.** Upon request and as technically feasible, Ameritech rebrands OS or DA with the name of the reseller or requesting carrier in conjunction with resold telephone exchange service or unbundled local switching. 47 C.F.R. § 51.217(d). AT&T Schs. 9.2.7(2.2), 9.5(8.15). Such optional rebranding is performed at the front end of the call on a mechanized basis using a short recorded announcement provided by

the reseller or requesting carrier. However, rebranding requires that the OS or DA traffic involved be routed to Ameritech's OS or DA platform on separate trunks from Ameritech's own traffic, so Ameritech can identify the traffic as belonging to the reseller or requesting carrier and brand it accordingly. Special or custom routing on a line-by-line basis will be provided as technically feasible.

103. Special and custom routing can pose substantial technical and administrative problems, however, and, depending on the complexity and scope of the request and the circumstances of the switch involved, may not be feasible in some cases. For these reasons, special and custom routing is requested through the BFR process.
104. Ameritech currently furnishes directory assistance to Brooks Fiber, MFS and MCI Metro and operator call completion to Brooks Fiber, TCG and MFS. At present, Ameritech has 30 active directory assistance trunks and 24 active operator services trunks in Michigan.

#### **VIII. CHECKLIST ITEM (viii): WHITE PAGES LISTINGS**

105. Section 271(c)(2)(B)(viii) requires BOCs to provide "White Pages directory listings for customers of the other carrier's telephone exchange service." Ameritech satisfies this requirement by ensuring that its directory publishing affiliate "will publish the Primary Listing of [Requesting Carrier] Customers located within the geographic scope of